

# EXHIBIT A

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IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

IN RE BARD IVC FILTERS  
PRODUCTS LIABILITY LITIGATION

*Christine Ann Bisesi and Michael Bisesi*

Plaintiffs,

v.

*C.R. Bard, Inc., and Bard Peripheral  
Vascular Inc.,*

Defendants

No. 2:15-MD-02641 -DGC

Case No. 2:16-cv-1391-DGC

**MASTER SHORT FORM COMPLAINT  
FOR DAMAGES FOR INDIVIDUAL  
CLAIMS AND JURY DEMAND  
FIRST AMENDED COMPLAINT –  
SECOND AMENDED MASTER SHORT  
FORM COMPLAINT FOR DAMAGES  
FOR INDIVIDUAL CLAIMS AND  
DEMAND FOR JURY TRIAL**

Plaintiff(s) named below, for their Complaint against Defendants named below,  
incorporate the Master Complaint for Damages in MDL 2641 by reference (Doc.364).

Plaintiff(s) further show the Court as follows:

1. Plaintiff/Deceased Party:

Christine Ann Bisesi

2. Spousal Plaintiff/Deceased Party's spouse or other party making loss of consortium claim:

Michael Bisesi

3. Other Plaintiff and capacity (i.e., administrator, executor, guardian, conservator):

N/A

4. Plaintiff's/Deceased Party's state(s) ~~[if more than one Plaintiff]~~ of residence at the time of implant:

Ohio

5. Plaintiff's/Deceased Party's state(s) ~~[if more than one Plaintiff]~~ of residence at the time of injury:

Ohio

6. Plaintiff's current state(s) ~~[if more than one Plaintiff]~~ of residence:

Ohio

7. District Court and Division in which venue would be proper absent direct filing:

Southern District of Ohio

8. Defendants (check Defendants against whom Complaint is made):

☒ C.R. Bard Inc.

☒ Bard Peripheral Vascular, Inc.

9. Basis of Jurisdiction:

☒ Diversity of Citizenship

☐ Other: \_\_\_\_\_

a. Other allegations of jurisdiction and venue not expressed in Master Complaint:

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10. Defendants' Inferior Vena Cava Filter(s) about which Plaintiff(s) is making a claim (Check applicable Inferior Vena Cava Filter(s)):

- ☐ Recovery<sup>®</sup> Vena Cava Filter
- ☒ G2<sup>®</sup> Vena Cava Filter
- ☐ G2<sup>®</sup> Express ~~(G2<sup>®</sup> X)~~ Vena Cava Filter
- ☐ G2<sup>®</sup> X Vena Cava Filter
- ☐ Eclipse<sup>®</sup> Vena Cava Filter
- ☐ Meridian<sup>®</sup> Vena Cava Filter
- ☐ Denali<sup>®</sup> Vena Cava Filter
- ☐ Other: \_\_\_\_\_

11. Date of Implantation as to each product:

November 23, 2006

12. Counts in the Master Complaint brought by Plaintiff(s):

- ☒ Count I: Strict Products Liability – Manufacturing Defect
- ☒ Count II: Strict Products Liability – Information Defect (Failure to Warn)
- ☒ Count III: Strict Products Liability – Design Defect

- ☒ Count IV: Negligence - Design
- ☒ Count V: Negligence - Manufacture
- ☒ Count VI: Negligence – Failure to Recall/Retrofit
- ☒ Count VII: Negligence – Failure to Warn
- ☒ Count VIII: Negligent Misrepresentation
- ☒ Count IX: Negligence *Per Se*
- ☒ Count X: Breach of Express Warranty
- ☒ Count XI: Breach of Implied Warranty
- ☒ Count XII: Fraudulent Misrepresentation
- ☒ Count XIII: Fraudulent Concealment
- ☒ Count XIV: Violations of Applicable Ohio Law Prohibiting Consumer Fraud and Unfair and Deceptive Trade Practices
- ☒ ☐ Count XV: Loss of Consortium
- ☐ Count XVI: Wrongful Death
- ☐ Count XVII: Survival
- ☒ Punitive Damages
- ☐ Other(s): \_\_\_\_\_ (please state the facts supporting this Count in the space immediately below)
- \_\_\_\_\_
- \_\_\_\_\_
- \_\_\_\_\_

13. Jury Trial demanded for all issues so triable?

☒ Yes

☐ No

~~Plaintiff requests trial by jury.~~

RESPECTFULLY SUBMITTED this ~~6th day of May~~, 8th day of July, 2016.

JOHNSON BECKER, PLLC

By /s/ Michael K. Johnson  
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CERTIFICATE OF SERVICE

I hereby certify that on this ~~6th day of May~~, 8th day of July, 2016, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/Michael K. Johnson